

# **EXHIBIT 18**

IBN WILLIAMS,

*Plaintiff,*

v.

COPPIN STATE UNIVERSITY,  
THE UNIVERSITY SYSTEM OF  
MARYLAND, LUCIEN  
BROWNLEE, DEREK CARTER,  
JUAN DIXON, THE STATE OF  
MARYLAND, JOHN DOES I-X,  
AND ABC CORP. I-X,

*Defendants.*

IN THE

CIRCUIT COURT

FOR

BALTIMORE CITY

No. 24-C-22-004662

RECEIVED  
CIRCUIT COURT FOR  
BALTIMORE CITY  
23 MAY 18 AM 11:05  
CIVIL DIVISION

\* \* \* \* \*

**UNIVERSITY DEFENDANTS' MOTION TO STAY DISCOVERY PENDING  
DISPOSITION OF THEIR MOTION TO DISMISS**

Defendants, Coppin State University, the University System of Maryland, the State of Maryland, Derek Carter, and Juan Dixon, (collectively the "University Defendants"), by their undersigned counsel, respectfully request that all discovery and other deadlines in this matter be stayed pending disposition of their motion to dismiss the complaint, and state as follows:

1. Plaintiff, Ibn Williams, filed a five-count complaint against the University Defendants and Lucien Brownlee asserting claims of negligence, negligent hiring and retention, negligent infliction of emotional distress, intentional infliction of emotional distress, and breach of contract relating to their management of the Coppin State University

basketball program, and those in positions of authority over the basketball program, while he was a student-athlete on the basketball team.

2. On May 18, 2023, the University Defendants filed a motion to dismiss all claims against them in their entirety on the grounds that they are entitled to immunity and for failure to state a claim upon which relief can be granted.

3. This motion is fully dispositive of the claims against the University Defendants. A stay will prevent them from the burden, time, and expense of discovery and further litigation. Further, it will prevent potentially unnecessary disputes over the disclosure of student information protected by the Family Educational Rights and Privacy Act, and other sensitive and confidential information, given the nature of the allegations in this matter.

4. Even if the Court is only inclined to grant the University Defendants' motion in part and dismiss some of the claims or parties, the requested stay is still appropriate. The Court's ruling on the motion will determine which claims and parties survive and thus will affect the parameters and scope of permissible discovery under the Maryland Rules. Without knowing this information, it is unlikely that the parties will reach agreement about what constitutes discoverable information.

WHEREFORE, the University Defendants respectfully request that the Court grant their motion and stay all discovery and other deadlines pending disposition of their motion to dismiss all claims against them. A proposed Order is attached.

Respectfully submitted,

ANTHONY G. BROWN  
Attorney General of Maryland

A handwritten signature in black ink, appearing to read 'Ariel Lichterman', is written over a horizontal line.

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May 18, 2023


Attorneys for Coppin State University,  
the University System of Maryland, the  
State of Maryland, Derek Carter, and Juan  
Dixon

**CERTIFICATE OF SERVICE**

I certify that, on this 18<sup>th</sup> day of May, 2023, the foregoing was served by first-class mail and email on all persons entitled to service:

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Ariel Lichterman

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\* \* \* \* \*

**PROPOSED ORDER**

Upon consideration of the Motion to Stay Discovery filed by Defendants Coppin State University, the University System of Maryland, the State of Maryland, Derek Carter, and Juan Dixon, (collectively the “University Defendants”), and good cause appearing therefore, it is this \_\_\_\_\_ day of \_\_\_\_\_, 2023, ORDERED:

That the University Defendants’ Motion to Stay Discovery is hereby GRANTED;  
and

Discovery and all other deadlines in this matter are stayed pending disposition of the University Defendants’ motion to dismiss.

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